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Co-Liaison Counsel and Executive Committee Members for the Class

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re NOVO NORDISK SECURITIES)	Master File No. 3:17-cv-00209-ZNQ-
LITIGATION)	LHG
_____)	
This Document Relates To:)	<u>CLASS ACTION</u>
)	
ALL ACTIONS.)	
_____)	

NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT

PLEASE TAKE NOTICE THAT the undersigned attorneys for Lead Plaintiffs Lehigh County Employees' Retirement System, Oklahoma Firefighters Pension and Retirement System, Boston Retirement System, Employees' Pension Plan of the City of Clearwater, and Central States, Southeast and Southwest Areas Pension Fund (collectively, "Lead Plaintiffs") will move before the Court for an Order:

1. preliminarily approving the settlement (the "Settlement"), the terms of which are contained in the Stipulation and Agreement of Settlement (the "Stipulation") submitted herewith, as being fair, reasonable and adequate to Class Members, subject to further consideration at the Settlement Hearing described below;

2. scheduling a hearing (the "Settlement Hearing") pursuant to Rule 23(e) of the Federal Rules of Civil Procedure for the following purposes:

(a) to determine whether the proposed Settlement is fair, reasonable and adequate to Class Members, and should be approved by the Court;

(b) to determine whether the Judgment as provided under the Stipulation should be entered dismissing the Action with prejudice against Defendants;

(c) to determine whether the proposed Plan of Allocation of the proceeds of the Settlement is fair and reasonable, and should be approved by the Court;

(d) to consider Lead Counsel's application for an award of attorneys' fees and Litigation Expenses; and

(e) to rule upon such other matters as the Court may deem appropriate.

3. approving the form, substance and requirements of the Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Notice"), the Proof of Claim and Release form (the "Proof of Claim"), and the Summary Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Summary Notice"), annexed to the Stipulation as Exhibits A-1, A-2, and A-3, respectively, and finding that the form, content and mailing and distribution of the Notice and publishing of the Summary Notice substantially in the manner and form submitted herewith meet the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), and due process, and is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons and entities entitled thereto;

4. approving the appointment JND Legal Administration as the Claims Administrator; and

5. entering the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice in the form submitted herewith.

In support hereof, Lead Plaintiffs shall rely upon the Stipulation and all documents attached thereto and Lead Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement.

A [Proposed] Order Preliminarily Approving Settlement and Providing for Notice is submitted herewith.

DATED: November 23, 2021

Respectfully submitted,

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
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/s/ Christopher A. Seeger
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